## THE DISTRICT COURT OF THE UNITED STATES DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION

UNITED STATES OF AMERICA,	)
	) CASE NUMBER: 2:22-cr-00993-RMG
Plaintiff,	)
v.	) MOTION FOR RETURN OF BOND
	)
JONATHAN RAMACI,	)
	)
Defendant.	

The Defendant, by and through his undersigned counsel, hereby moves this Honorable Court for an Order returning the surety bond and/or cash security in the above referenced case.

On or about December 16, 2022, the Defendant's spouse, Mrs. Haverly Ramaci, deposited a cash security in the amount of \$5,000.00 as security for Defendant's bond. The Court entered a final judgment on February 7, 2025, sentencing Defendant to a term of incarceration in the Bureau of Prisons. To date, the Defendant has fully complied with the conditions of his bond. He will remain on bond and compliant with the conditions of his bond until such time he reports to the Bureau of Prisons.

Based on the foregoing, the Defendant respectfully moves the Court to enter an Order returning the above referenced surety bond and/or cash security to Mrs. Haverly Ramaci upon the Defendant reporting to serve his sentence in the Bureau of Prisons.

By: Respectfully submitted,

/s/ Jerry N. Theos

Jerry N. Theos, Esq. (Fed. I.D. 4055) E. Gordon Hay, VI, Esq., (Fed.ID 13490)

Theos Law Firm, LLC

11 State Street, Charleston, SC 29401

jerry@theoslaw.com; gordon@theoslaw.com

(843) 577-7046

/s/ Joseph P. Griffith, Jr. Joseph P. Griffith, Esquire (Fed I.D. 2473) Joe Griffith Law Firm, LLC 946 Johnnie Dodds Blvd. Mt. Pleasant, S.C. 29464 843.225.5563 (tel) joegriffithjr@hotmail.com ATTORNEYS FOR DEFENDANT

February 17, 2025 Charleston, SC